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AMTECK OF KENTUCKY, INC. and THE HASKELL COMPANY
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UNITED STATES DISTRICT COURT
9
NORTHERN DISTRICT OF CALIFORNIA
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11 REYNALDO SALINAS, et al.,)	CASE NO. C 08-01463 PJH
)	
12 Plaintiffs,)	
)	
13 vs.)	Date: July 23, 2008
)	Time: 9:00 a.m
14 AMTECK OF TEXAS, et al.,)	Courtroom: 3
)	
15 Defendants.)	
)	
16)	

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18 REQUEST FOR JUDICIAL NOTICE RE:
19 DEFENDANTS AMTECK OF KENTUCKY, INC. and THE HASKELL COMPANY'S REPLY
20 TO PLAINTIFFS' OPPOSITION TO MOTION FOR ASSESSMENT OF FEES AND COSTS
AGAINST PLAINTIFFS IN THE AMOUNT OF \$77,847.66 AND FOR STAY OR DISMISSAL
21 OF PROCEEDINGS PENDING PAYMENT
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1 Pursuant to Federal Rule of Evidence 201, defendants Amteck of Kentucky, Inc. and the
2 Haskell Company request that the court take judicial notice of the following facts:

- 3 1. Plaintiffs Gerardo Salinas and Alejandra Salinas, individually and as representatives
4 of the Estate of Jose Martin Salinas have filed a complaint based on the same
5 operative facts of this case in Hildago County, Texas. See Exhibit C to this reply
6 brief accompanying this brief.
- 7 2. Plaintiffs Gerardo Salinas and Alejandra Salinas, individually and as representatives
8 of the Estate of Jose Martin Salinas filed the action referred to in No. 1 against
9 Amteck of Texas, Amteck of Kentucky, Inc., U.S. Trades LLC, Haskell Company
10 d.b.a. The Haskell Company of Florida and Snorkel International. Plaintiffs Gerardo
11 Salinas and Alejandra Salinas, individually and as representatives of the Estate of
12 Jose Martin Salinas.
- 13 3. As indicated in the complaint referenced in No. 1, plaintiffs Gerardo Salinas and
14 Alejandra Salinas allege they are the parents of decedent Jose Martin Salinas.

15 DATED: July 9, 2008

DIEPENBROCK & COTTER, LLP

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17 By: /s/ John P. Cotter
18 JOHN P. COTTER
19 ANTHONY R. ROSSMILLER
20 Attorneys for Defendants
21 AMTECK OF KENTUCKY, INC. and THE
22 HASKELL COMPANY
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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the above and forgoing document was sent via ELECTRONIC SERVICE (through ECF website) or UNITED PARCEL SERVICE to the counsel listed below on July 9, 2008:

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10 I declare under penalty of perjury that the forgoing is true and correct.

11 */s/ John P. Cotter*

12 _____
13 JOHN P. COTTER

14 H:\DEEP SOUTH\Salinas\Pleadings\FEDERAL COURT\Rule 41 Motion\mot-costs-frcp41(2)- opp - req for judicial notice.wpd